

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

FRANK SACCA,)	
)	
Plaintiff,)	Hon. Judge Thomas M. Durkin
)	
v.)	Hon. Mag. Judge Sidney I. Schenkier
)	
WYOMING WHISKEY, INC.,)	
BRADFORD MEAD, KATHERINE MEAD,)	
and DAVID DEFAZIO,)	Case No. 1:17-cv-8298
)	
Defendants.)	

**MOTION TO DISMISS PURSUANT TO RULE 12(b)(2), RULE 12(b)(3), THE
DOCTRINE OF FORUM NON CONVENIENS, AND RULE 12(b)(6), OR, IN THE
ALTERNATIVE, TRANSFER TO THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF WYOMING PURSUANT TO 28 U.S.C. § 1404(a)**

Defendants, WYOMING WHISKEY, INC., BRADFORD MEAD, KATHERINE MEAD, and DAVID DEFAZIO, by and through their attorneys of record, Reno & Zahm LLP, hereby move this Court for an Order seeking dismissal (1) under Fed. R. Civ. P. 12(b)(2) on the grounds that the individual Defendants are not subject to personal jurisdiction in the State of Illinois; (2) under Fed. R. Civ. P. 12(b)(3) on the grounds that Illinois is an improper venue for this litigation; (3) under the doctrine of *forum non conveniens* on the grounds that Illinois is an inconvenient forum for this litigation; and (4) under Fed. R. Civ. P. 12(b)(6) on the grounds that Plaintiff fails to state a claim upon which relief can be granted; or, in the alternative, transferred to the United States District Court for the District of Wyoming pursuant to 28 U.S.C § 1404. This Motion is supported by the Memorandum of Law in Support of Defendants' Motion to Dismiss and the exhibits attached thereto.

WHEREFORE, Defendants, WYOMING WHISKEY, INC., BRADFORD MEAD, KATHERINE MEAD, and DAVID DEFAZIO, pray that this Court enter an Order dismissing the Complaint with prejudice, or, in the alternative, transferred to the United States District Court of Wyoming, or, in the alternative, awarding Defendants their attorney's fees and costs, and for such other relief as the Court deems just and proper.

Dated this 27th day of November, 2017.

RENO & ZAHM LLP

By: /s/ Jeffrey H. Powell, Esq.

Jeffrey H. Powell, Esq., Attorney for
Defendants Wyoming Whiskey, Inc.,
Bradford Mead, Katherine Mead, and David
DeFazio

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a copy of the **Motion to Dismiss** was electronically served upon the registered CM/ECF users and via electronic mail service upon any non-registered CM/ECF users in the above-entitled case on this 27th day of November, 2017.

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Jeffrey H. Powell, Attorney for Defendants
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Katherine Mead, and David DeFazio

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